

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 18-150(1) (DWF/HB)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	DEFENDANT'S MOTION FOR
)	HEARING PURSUANT TO <i>FRANKS</i>
)	<i>v. DELAWARE</i>
MICHAEL HARI,)	
)	
Defendant.)	

Michael Hari, through undersigned counsel, moves the Court to conduct an evidentiary hearing to examine the affidavits made in support of search warrants for:

- 1) The home of Mr. Hari's parents, 1** North 1900E Rd., Paxton, Illinois;
- 2) Mr. Hari's business office, 1** S. Main Rd., Clarence, Illinois; and,
- 3) Mr. Hari's home, 2** West First Street North, Clarence, Illinois.

As contemplated by *Franks v. Delaware*, a defendant is entitled to such a hearing upon showing that the affidavit contains statements made with a reckless disregard for the truth that affect a reviewing court's finding of probable cause.

As set forth in a separately-filed memorandum, Mr. Hari makes the necessary showing and respectfully requests that the Court schedule a *Franks* hearing at its convenience.

Dated: July 18, 2019

Respectfully submitted,

s/ Shannon Elkins

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